

STATE OF MARYLAND * CASE NO. C-10-CR-23-000513 RM
VS * 6/21/2023
DAKEM HANNON * IN THE DISTRICT COURT FOR
FREDERICK COUNTY, MARYLAND

STATE'S OPPOSITION TO DEFENDANT'S
MOTION FOR BOND REVIEW

COMES NOW the State of Maryland, by and through Jason S. Shoemaker, Assistant State's Attorney for Frederick County, Maryland, and in response to the Defendant's Motion for Bond Review, states as follows:

1. The State is opposed to any change in the Defendant's bond status.
2. This Defendant's record, per a bond report, shows prior contacts with the system.
3. Those contacts resulted in five criminal and one serious motor vehicle conviction.
4. Three of those convictions are out of the State of New York and include two separate convictions for selling controlled dangerous substances (2003 and 2011).
5. The remaining three convictions are from Maryland and include one second degree assault (2014) and one resisting/interfering with arrest (2021).
6. The Defendant was on unsupervised probation for the resisting/interfering with arrest case, at the time of this incident.
7. On the date of this incident, April 24, 2023, the Defendant engaged in a string of offenses.
8. It began with the breaking and entering of the victim business, the Defendant's former employer, by following another employee into a secured door once the employee swiped his access card to gain entry.
9. The Defendant next entered to employee break room at that business and began

grabbing the personal belongings of the employees at the victim business, which were stored on a table there.

10. The Defendant then engaged the victim, Caleb Farmer, asking him what was in a bag which was attached, by a strap, around the person of the victim.

11. The victim knew that the Defendant had been employed at the business, at some point, but was not otherwise acquainted with him.

12. That bag contained Mr. Farmer's needed medication, and Mr. Farmer advised the Defendant of that.

13. The Defendant said, "let me see that," as he pushed the victim and reached and unclipped the strap holding the bag around Mr. Farmer's body.

14. A struggle ensued between the Defendant and Mr. Farmer, who advised he told the Defendant he was not giving him that bag.

15. The victim was able to wrestle the bag away from the Defendant and leave the break room.

16. The police were called, and the Defendant left the business with the bags of various employees from the business.

17. Officers then worked to locate the Defendant as he walked further toward the center of Downtown Frederick.

18. During this time, at least one employee of the business, maintained observation of the Defendant as the police were responding.

19. During that time, the Defendant was observed approaching various vehicles and, at least, two houses, attempting to gain entry into them.

20. As the Defendant continued to move about Downtown Frederick, he eventually threw

the bags he had taken from the business in a trash/recycle bin.

21. Next, the Defendant was observed taking a delivery package from the front step of another residence, with which the Defendant had no affiliation or connection.

22. The Defendant was in possession of that package when the police apprehended him.

23. The Defendant deliberately engaged in criminal behaviors that put others and their property at risk, and during one of those incidents, forcefully removed a bag from Mr. Farmer's person.

24. While the Defendant may, or may not, need some type of treatment, that is not appropriate for consideration at this time.

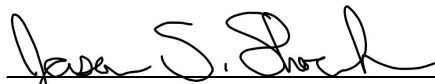
25. This Defendant, by his actions, engaged in behaviors indicating he poses a risk to the person of others, in this case, his former employer's business, and a former co-worker.

26. Certainly, with all of the violence at businesses in recent times, there is a heightened sense of concern surrounding the nature of the offense in this case.

27. Based on the foregoing, this Defendant should be continued to be held without bond.

WHEREFORE, the State opposes the relief sought and requests that the Court deny the Defendant's Motion for another bond review, and that it do so without a hearing.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of June 2023, a copy of the foregoing State's Opposition to Defendant's Motion for Bond Review was sent via MDEC and/or Citrix, a secure file sharing service, to the designated email address and/or service contact for Stephen Musselman, Assistant Public Defender, attorney for the Defendant herein.



JASON S. SHOEMAKER
ASSISTANT STATE'S ATTORNEY